



## Privacy Statement

### Introduction

This Privacy Policy was last updated 23<sup>rd</sup> May 2018 and supersedes any previous version.

We are bound by applicable data protection laws in the respect of the handling and collection of your personal data. BETPOINT GROUP LIMITED is a registered data controller in Malta. Your personal information is held on servers based in Malta.

BETPOINT GROUP LIMITED (“**us**”, “**we**”, “**our**” or the “**Company**”) is a company incorporated under the laws of Malta, with company number C52434 and registered offices at Tigne Place, Floor 2/1 Tigne Street, Sliema SLM3173, Malta. We respect your privacy and are committed to protect the privacy of our users (“**user**”, “**you**” or “**Player**”

1. This privacy policy (“Privacy Policy”) outlines our practices with respect to collecting, using and disclosing your information through the use of our website [www.bingo69.com](http://www.bingo69.com).
2. This Privacy Policy outlines how we collect information from you, what we do with it and what controls you have over our use of that information. If you have any requests concerning your personal information or any queries relating to these practices, please contact us [DPO@betpointgroup.com](mailto:DPO@betpointgroup.com)
3. We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By using our Services, you agree to the terms of this policy. If you do not agree with this policy, please do not supply us any information.
4. The Privacy Policy is a part of our Terms of Service and is incorporated therein by references

BETPOINT GROUP LIMITED is committed to respecting your privacy and to complying with applicable data protection laws.

You are under no obligation to provide Personal Information to us; however, certain Personal Information is necessary for the provision and quality of the services offered to you such as the games provided on our website. If you choose to withhold requested information required for those services we may not be able to facilitate you.

All BETPOINT GROUP LIMITED employees are required to comply with the terms of this Privacy Policy. This Privacy Policy provides that employees are obliged to keep your information strictly confidential. This obligation continues once an employee has left BETPOINT GROUP LIMITED.

### Definitions

- Data Subject(s) means an identified or identifiable natural person, the Personal Data of which is being processed by BETPOINT GROUP LIMITED.
- Personal Data means any data that can or may be used whether alone or in combination with other information, in order to identify a single person (including information relating to BETPOINT GROUP LIMITED's employees, contact persons working for affiliates, etc.).
- Processing – any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation,



structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- Profiling – is any form of automated processing of personal data intended to evaluate certain personal aspects relating to a natural person, or to analyse or predict that person's performance at work, economic situation, location, health, personal preferences, reliability, or behaviour. This definition is linked to the right of the data subject to object to profiling and a right to be informed about the existence of profiling, of measures based on profiling and the envisaged effects of profiling on the individual
- Third party – a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data

## What type of information we collect

We collect two types of data and information from you:

(1) Non-Personal Information – We retain some non-personally identifiable information ("Non-Personal Information"), such as your approximate geo-location, your web request, browser type, browser language, web pages you visit before or after visiting our Website or using the App, URLs, platform type, click numbers, landing pages, viewed pages and the order of those pages and time spent on pages. This information is collected and retained for security reasons and so that we can audit and statistically track usage, audit our affiliates, and calculate payments to third parties.

(2) Personal Information – "Personal Information" is information that may be of a private or sensitive nature, including your name, gender, phone number, e-mail address or mailing address, and IP address. When you use our Services you will be asked to provide Personal Information to us. This includes:

**Data submitted when registering to our Services:** In order to become Players and use our Services, you will be required to register and open a User account. As part of the process, you required to provide certain, data including your date of birth, phone number, full name, home or other physical address, e-mail address and other contact information.

**Payment information:** We collect payment information from our Players, including credit card number, Bank account, and other financial information that we may need in order to provide our Services to Players.

**Voluntary information:** We also collect information which you provide us voluntarily. We collect your information when you respond to communications from us, contact our support, communicate with us via email, website and through any online platform (e.g. our Facebook page) or share additional information about yourself or about others through your use of the Services.

**Device Information:** We also collect Personal Information from your device, such as geolocation data, IP address and other online identifiers (i.e. online data collected from user's devices, applications and protocols which leave traces which may be used to identify users).

We also collect information which you provide us voluntarily. For example, we collect Personal Information which you provide when you:

1. Respond to communications from us;
2. Open an account and use the Services; and
3. Communicate with us via Facebook or via email or through any other means of direct contact
- 4.

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We collect information through our trusted third-party services, such as information about your credit history agencies and other financial information which is relevant to our Services, as well as information which is gathered in order to verify your identity and prevent fraudulent or illegal activity.

We collect Personal Information which is related to Player's activity on the website as this information helps us to track fraudulent, unlawful or improper activity on the user's behalf

## How we collect your information?

There are three main methods we may use to collect information:

We collect information through your use of the Services: when you are using our Services, we are aware of it and may gather the information relating to such usage, either independently or through the help of third-party services as detailed below.

When you visit or access our Website or when you interact or engage with our Services, we use (and authorize third parties to use) web beacons, cookies, pixel tags, scripts, tags and other technologies ("Tracking Technologies"). To learn more please visit our [Cookie Policy](#).

The Tracking Technologies allow us to automatically collect information about you and your online behaviour, as well as your device (for example your computer or mobile device), in order to enhance your navigation on our Website, improve our Website's performance and customize your experience on our Website. We also use this information to collect statistics about the usage of our Website, perform analytics, deliver content which is tailored to your interests and administer services to our Users, advertisers, publishers, customers and partners.

We also allow third parties to collect information about you through Tracking Technologies. This information is anonymised and cannot identify you and is used for marketing and ad-targeting purposes.

## How we use the information we collect?

We use and share Personal Information in the manners described in below:

To set up your account and to provide our Services (e.g. send out cash-out checks, process your payments; etc.)

To identify and authenticate your access to certain features of the Services including as part of KYC ("Know Your Customer") procedures;

To market our websites and products (see below under "Marketing");

To serve you advertisements when you use our Services;

To perform a research or to conduct analytics in order to improve and customize our Services to your needs and interests;

To provide you with a responsible gaming environment;

To support and troubleshoot our Services and to respond to your queries, as well as to enable you to exercise your rights;

To prevent fraudulent or illegal activity;

To comply with all legal and regulatory requirements, such as those relating to the identification of individuals under money laundering legislation or other legislations; and

To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request.

## With whom we share the information we collect and for what purpose?

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We do not rent, sell, or share your Personal Information with third parties except as described in this Privacy Policy.

We share Personal Information with the following entities:

- our subsidiaries;
- subcontractors and other third-party service providers, as described below;
- auditors or advisers of any of BETPOINT GROUP LIMITED 's business processes;
- our service providers.

We share Personal Information for the purposes listed above, as well as for the following purposes:

- Providing you with our Services;
- Storing such information on our behalf;
- Processing such information to assist us with our business operations (e.g. to process payments and your deposits; authenticate your access; auditing our operations, etc.);
- In order to enhance the functionality of our Services.
- To administer the Services and analyse this information to improve and enhance the Services by expanding their features and functionality. Such data is also used for troubleshooting errors and bugs as well as for research and analytics purposes about your use of the Services.
- Performing research, technical diagnostics or analytics.

**Interest-based advertising:** we also use and share information we have about Players, including information collected through our Tracking Technologies, with our partners (in various jurisdictions around the world) for advertising purposes.

**Marketing:** We may use your Personal Information, such as your name, email address, telephone number, etc. ourselves or by using our third-party subcontractors for the purpose of providing you with promotional materials, concerning our Services, as well as products, services, websites and applications. Out of respect to your right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us. In addition, at any time, you may request to unsubscribe and discontinue receiving marketing offers by contacting our customer services team at [support@bingo69.com](mailto:support@bingo69.com) or by clicking to unsubscribe from the My Account section.

We also disclose Personal Information, or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to:

- comply with any applicable law, regulation, legal process or governmental request;
- enforce our policies (including our Agreement), including investigations of potential violations thereof;
- investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues, or to prevent harm to the rights, property or safety of us, our users, yourself or any third party;
- to establish or exercise our rights to defend against legal claims; or
- for the purpose of collaborating with law enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights.

We also disclose Personal Information with regulators, upon request for disclosures. Such information includes (but is not limited to) details of users violating our terms and conditions (such as users under 18 years of age),

# BETPOINT GROUP

users that have self-excluded; users who contravene the responsible gaming policy; users engaging in suspicious transactions or suspected to be engaging in money laundering or fraud; users attempting to modify our products or services (or attempting to, or being suspected of, so doing); and users who register a dispute with the applicable regulator.

## Information collected by third parties

We may at some point appoint certain third parties including but not limited to, advertising agencies, risk and fraud agencies, KYC agencies or customer service agencies to process your personal data on our behalf. These third parties will only process your personal data in accordance with our instructions and we will ensure that adequate measures are in place to ensure that your personal data is processed only in accordance with this Privacy Policy and kept secure at all times.

## How do we safeguard your information?

We take great care in implementing and maintaining the security of the Services and your information.

We employ industry standard procedures and policies to ensure the safety of our users' information and prevent unauthorised use of any such information. When you submit Personal Information via the Website, your details are protected. Wherever we collect Personal Information, that information is encrypted and transmitted to us in a secure way.

We use 128 SSL bit encryption to protect confidential Personal Information that is transmitted online. We also take measures to protect your Personal Information offline.

Only employees who need access to particular information in order to perform their role (for example, billing or customer service) are granted access to our customers' Personal Information. The computers and servers in which we store personal data are kept in a highly secure environment.

Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

As an additional safeguard to Your Information, BETPOINT GROUP LIMITED employs a Data Protection Officer ("DPO"). The DPO has the power to insist on BETPOINT GROUP LIMITED resources for information protection matters and has as a deep knowledge of Information protection regulation and law privacy requirements. The DPO's responsibility includes, among other things: privacy and security compliance advice, notify authorities of a data breach incident, conducting awareness and training programs, etc.

## How do we transfer your data?

Since we operate globally, it may be necessary to transfer your Personal Information to countries outside the European Union. The data protection and other laws of these countries may not be as comprehensive as those in the European Union – in these instances transfer your data only with recipients located in such countries as approved by the European Commission as providing adequate level of data protection, or enter into legal agreements ensuring an adequate level of data protection.

## User Rights?

This section addresses certain rights that you may exercise with respect to your Personal Information. We respect your privacy rights and therefore you may contact us at [DPO@betpointgroup.com](mailto:DPO@betpointgroup.com) at any time and request:

- To access any Personal Information relating to you;
- To amend or rectify inaccuracies in Personal Information relating to you (for example, if you believe that your Personal Information is incorrect, you may ask to have it corrected);
- To block or suppress processing of your Personal Information, in certain cases;

# BETPOINT GROUP

- To delete Personal Information relating to you;
- That Personal Information you directly volunteered be provided to you in a machine readable portable format, where possible;
- You also have the right to lodge a complaint with a supervisory authority.
- However, please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements.

## Retention

The BETPOINT GROUP LIMITED will retain your personal information for as long as necessary to provide the Service, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Under applicable regulations, we will keep records containing client personal data, account opening documents, communications and anything else as required by applicable laws and regulations.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

## Updates or amendments to the privacy policy

This policy will be reviewed and amended, if applicable, by the DPO every 12 months or when there is a material change in the BETPOINT GROUP LIMITED data processing practices, whichever is sooner.

The most current version will always be posted on our website (as reflected in the "Last Revised" heading). We encourage you to review this Privacy Policy regularly for any changes. In case of material changes we will notify you through our Services or by email.

Your continued use of the Services, following the notification of such amendments on our website, constitutes your acknowledgement and consent of such amendments to the Privacy Policy and your agreement to be bound by the terms of such amendments.

## Contact Us

If you have any general questions about the Services or the information that we collect about you and how we use it, please contact us at [DPO@betpointgroup.com](mailto:DPO@betpointgroup.com)

If you feel that your privacy was treated not in accordance with our policy, or if any person attempted to abuse our Services or acted in an inappropriate manner, please our DPO directly at [DPO@betpointgroup.com](mailto:DPO@betpointgroup.com)